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April 19, 2019

File No: 4012-008

Via Electronic Delivery

Ms. Kim Muratore
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
muratore.kim@epa.gov

Re: CERCLA Section 104(e) Information Request Letter;
Orange County North Basin Study Area, Orange County, California

Dear Ms. Muratore:

This letter, together with all attachments, enclosures and supplements, constitutes the second part of Arconic Inc.'s and Arconic Global Fasteners & Rings, Inc.'s initial, combined¹ responses (collectively, the "Responses") to the U.S. Environmental Protection Agency's ("U.S. EPA's") CERCLA Section 104(e) Information Request Letters, Orange County North Basin Study Area, Orange County, California" dated September 13, 2018, and December 10, 2018, respectively (collectively, the "Requests") attached as enclosures to this letter. Arconic Inc. and Arconic Global Fasteners & Rings, Inc. reserve the right to modify and/or supplement these Responses. These written Responses supplement the information contained in the documents being provided in conjunction with these Responses, and the information in these written Responses is not intended to reiterate the information contained in those documents. While some of these Responses draw from and rely on documents being provided, these Responses do not,

¹ U.S. EPA authorized Arconic Inc. and Arconic Global Rings & Fasteners, Inc. to submit their responses as a combined document, provided that these Responses address all of the Requests. The Responses to requests 1-30 are the same for both Arconic Inc. and Arconic Global Rings & Fasteners, Inc., and there are separate responses for requests 31 and 32. In addition, U.S. EPA authorized Arconic Inc. and Arconic Global Rings & Fasteners, Inc. to submit the first part of these initial responses on April 1, 2019, and to provide additional responses by April 19, 2019.

and do not attempt to, restate or summarize all of the information contained in those documents. The sources of the Responses are the individuals identified in Response 1, documents related to the Facility, and other information about the Facility. Additionally, information about the Facility previously was collected in connection with state court litigation in Orange County, California which resulted in a judgment, upheld on appeal, in favor of Alcoa Global Fasteners, Inc. (now Arconic Global Fasteners & Rings, Inc.). In addition to other documents being produced as part of these Responses, certain documents produced in that litigation will be produced separately in response to the Requests and may be considered sources of information for the Responses. Further, securities disclosure documents, the companies' websites, and other publicly-available information also may be considered sources of information for the Responses; except as expressly stated in these Responses, such sources of information are not being provided in connection with these Responses. If the U.S. EPA requests, Arconic Inc. and Arconic Global Fasteners & Rings, Inc. can attempt to provide additional information, documents, and other sources of information in response to the Requests.

Arconic Inc. and Arconic Global Fasteners & Rings, Inc. intend for this second part of the initial responses to contain or provide both non-confidential and confidential documents or information, including without limitation "Confidential Business Information" as defined in applicable laws and regulations. Arconic Inc. and Arconic Global Fasteners & Rings, Inc. assert, and expressly reserve their rights to assert further, all protections relating to confidential documents and information, including without limitation "Confidential Business Information" as defined in applicable laws and regulations. Further, Arconic Inc. and Arconic Global Fasteners & Rings, Inc. expressly reserve their rights to assert all protections relating to inadvertently-produced privileged, protected, and/or confidential documents and information of any type.

In addition, Arconic Inc. and Arconic Global Fasteners & Rings, Inc. object to the Requests and each part of the Requests to the extent that the Requests, in whole or in part: (a) contain, or are based on, any misstatement of fact or any assumption based on a misstatement of fact, (b) pertain to any location and/or property other than that set forth in these Responses, (c) are ambiguous and/or indefinite (in which case these Responses are limited to Arconic Inc.'s and Arconic Global Fasteners & Rings, Inc.'s understanding without attempting to address any ambiguity and/or indefiniteness), (d) are irrelevant to a legitimate purpose based on the underlying statute, and/or (e) are overbroad in scope (in which case these Responses are limited to Arconic Inc.'s and Arconic Global Fasteners & Rings, Inc.'s understanding of the reasonable scope of the request). Without waiving these or any other objections to the Requests and any part or parts of the Requests, and subject to such objections, Arconic Inc. and Arconic Global Fasteners & Rings, Inc. have provided in these Responses the responsive, non-privileged information and documents resulting from Arconic Inc.'s and Arconic Global Fasteners & Rings, Inc.'s reasonable and diligent efforts to obtain and provide information and documents.

The documents provided herewith are Bates stamped ARC-EPA 006893 to ARC-EPA 009813. For efficiency, where a document is responsive to more than one request such document generally has been provided once. Where multiple copies of a document were present in the files there may be multiple copies included in the documents provided. While Arconic

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Inc. and Arconic Global Fasteners & Rings, Inc. have attempted to respond completely and truthfully to the Requests, Arconic Inc. and Arconic Global Fasteners & Rings, Inc. reserve the right and ability to correct, change, delete, and/or add information and/or documents to these Responses. Future correspondence regarding this matter should be directed to: David B. Sadwick, Esq., Tatro Tekosky, Sadwick LLP, 333 S. Hope Street, Suite 4270, Los Angeles, CA 90071.

Arconic Inc. and Arconic Global Fasteners & Rings, Inc. welcome the opportunity to provide these Responses to EPA and look forward to continuing a positive relationship with EPA regarding these issues.

Sincerely,

/s/ David B. Sadwick

David B. Sadwick
Attorneys for Arconic Inc. and
Arconic Global Fasteners & Rings, Inc.

Enclosures

Arconic Inc.'s and Arconic Global Fasteners, Inc.'s Initial Responses to the U.S. Environmental Protection Agency's CERCLA Section 104(e) Information Request Letters, Orange County North Basin Study Area, Orange County, California, dated September 13, 2018, and December 10, 2018¹

1. Richard Dworek
Chief Environmental & Real Estate Counsel
Arconic Inc.
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richard.dworek@arconic.com

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¹ The sources of the information provided in these Responses are records, documents, and other materials provided with, or referenced in, these Responses, as well as public records, research, and inquiry by the individuals answering these Requests. For some of the Responses, reference will be made to specific sources of information; additional references can be provided upon request.

2. Arconic Inc. (then known as Alcoa Inc.) acquired certain aspects of the fastener business of the Fairchild Corporation on or about December 3, 2002. As part of that acquisition, Arconic Global Fasteners & Rings, Inc. (then known as Alcoa Global Fasteners, Inc.) entered into a lease with the Fairchild Holding Corp. for the Facility on the same date.

Arconic Global Fasteners & Rings, Inc. (then known as Alcoa Global Fasteners, Inc.) continued to lease the Facility from Fairchild Holding Corp. until October 31, 2007, when the real property underlying the Facility was conveyed from Fairchild Holding Corp. to Arconic Inc. (then known as Alcoa Inc.). As of the date of this response, Arconic Inc. continues to own the property underlying the Facility and Arconic Global Fasteners & Rings, Inc. continues to occupy the Facility.

3. Please see the confidential document responsive to this request, which will be submitted in a separate submission.²
4. Please see the confidential document responsive to this request, which will be submitted in a separate submission.³
5. Please see the confidential document responsive to this request, which will be submitted in a separate submission.⁴
6. Arconic Inc. is a public company with operations throughout the world. A summary of its operations is provided in the Facility's most recent Annual Report, a copy of which was provided with the first part of these Responses. Arconic Inc. was known as Alcoa Inc. until November 1, 2016, when it spun-off its upstream operations into a separately-traded public company and changed its name from Alcoa Inc. to Arconic Inc.

Arconic Global Fasteners & Rings, Inc. is an operating subsidiary company of Arconic Inc. In addition to the Facility, it has another location in Fullerton at 801 S. Placentia Avenue as well as operating locations in Torrance, City of Industry, Simi Valley, and Tracy, California.

² Arconic Inc. and Arconic Global Fastener & Rings, Inc. will not purport to provide in this response every single member of the current and prior workforce at the Facility, such as hourly employees, who may have some limited knowledge of the subject matters requested. They have provided the names and information concerning individuals who they know to most likely have the most complete understanding of the information requested.

³ Arconic Inc. and Arconic Global Fastener & Rings, Inc. do not, by this response, concede that any one or more, or all, of the chemicals identified in this request are, or ever were, associated with the Facility.

⁴ Arconic Inc. and Arconic Global Fastener & Rings, Inc. do not, by this response, concede that any one or more, or all, of the physical features identified in this request are, or ever were, associated with the Facility.

7. Arconic Inc. was first formed and incorporated in 1888 in Pennsylvania as the Pittsburgh Reduction Company. In 1907, it changed its name to Aluminum Company of America, under which it operated until 1999, when it changed its name to Alcoa Inc. It operated as Alcoa Inc. until November 1, 2016, when it spun off its upstream operations into a separately-traded public company and changed its name to its current name, Arconic Inc. On December 31, 2017, Arconic Inc. changed its state of incorporation from Pennsylvania to Delaware.

Arconic Global Fasteners & Rings, Inc. was first incorporated in Delaware in November 1986 as AT Acquisition Company. It went through the following name changes:

AT Acquisition Company: 11/13/1986 - 1/30/1987

TRE Corporation: 1/30/1987 – 10/30/1987

Alcoa/TRE, Inc.: 10/30/1987 – 07/31/1990

Alcoa Composites: 7/31/1990 – 9/30/2002

Alcoa Global Fasteners, Inc.: 9/30/2002 – 8/22/2016

Arconic Global Fasteners & Rings, Inc. 8/22/2016 - Present

It remains a Delaware company.

8. Arconic Inc. is a public company, and, based upon best information and belief, it has been a public company since at least 1925. It is currently listed on the New York Stock Exchange under the ticker symbol ARNC.

Arconic Global Fasteners & Rings, Inc. is a direct, wholly-owned subsidiary of Cordant Technologies Holding Company (“Cordant”), which is in turn is a direct wholly-owned subsidiary of Arconic Inc.

Cordant is a Delaware company formed on September 24, 1991 as Huck Acquisition Co. It then changed its name on May 10, 1995 to Thiokol Holding Company and again on October 1, 1998 to its current name, Cordant Technologies Holding Company.

Arconic Inc., then known as Alcoa Inc., acquired Cordant Technologies Holding Company on or about May 25, 2000.

Arconic Inc., then known as Alcoa Inc., acquired certain aspects of the fastener business of the Fairchild Corporation on or about December 3, 2002, following which Arconic Inc., then known as Alcoa Inc., consolidated its fastener business, including the fastener operations from its Cordant acquisition, under the name Alcoa Global Fasteners, Inc., which is the predecessor in name to Arconic Global Fasteners & Rings, Inc.

9. See answers 6 through 8 above.

10. See answers 6 through 8 above.

11. Neither Arconic Inc. nor Arconic Global Fasteners & Rings, Inc. ever sold the Facility property.
12. Arconic Inc.'s current understanding is that the Fairchild Corporation and/or its wholly-owned subsidiary, Fairchild Holding Corp., owned and operated the Facility prior to Arconic Inc.'s acquisition of certain aspects of the Fairchild Corporation's fastener business on or about December 3, 2002. Based upon information and belief, the Fairchild Corporation acquired the Facility as part of its acquisition and/or merger with Kaynar Technologies, Inc. in April of 1999, and Kaynar Technologies, Inc. leased the Facility from 800 State College Partners beginning on or about December 31, 1979.

Please also see the confidential documents responsive to this request, which will be submitted in a separate submission.

Changes implemented by Arconic Inc. (then known as Alcoa Inc.) and/or Arconic Global Fasteners & Rings, Inc. (then known as "Alcoa Global Fasteners, Inc.") include changing the degreasing equipment and materials used at the Facility to decrease/eliminate the use and disposal of chemicals identified in this request (to the extent, if any, that one or more than one of such chemicals may have been so used and/or disposed).

13. Neither Arconic Inc. nor Arconic Global Fasteners & Rings, Inc. ever leased Facility property to a third party.
14. From December 3, 2002, when Arconic Inc. (then known as Alcoa Inc.) acquired certain aspects of the Fairchild Corporation's fastener business until October 31, 2007, when Arconic Inc. acquired title to the Facility's real property, Arconic Global Fasteners & Rings, Inc. (then known as Alcoa Global Fasteners, Inc.) leased the Facility property from Fairchild Holding Corp.
15. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
16. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
17. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
18. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
19. Please see the confidential documents responsive to this request, which will be submitted in a separate submission

20. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
21. See the documents submitted with these Responses for information responsive to this request. See, e.g., ARC-EPA 011599 to 012288.
 - a. Arconic Inc. and Arconic Global Fasteners & Rings, Inc. is providing a full set of the documents located in preparing these Responses.⁵
 - b. In the relatively near future, Arconic Global Fasteners & Rings, Inc. anticipates “rebound” testing of the soil vapor extraction system at the Facility in connection with the determination whether to discontinue that system which is being considered by the agency overseeing that system. Further, Arconic Global Fasteners & Rings, Inc. generally anticipates the potential for future sampling under the auspices of a state or local agency, but it does not currently have any such sampling scheduled.
22. Arconic Inc.’s and Arconic Global Fasteners & Rings, Inc.’s current understanding is that neither Arconic Inc. nor Arconic Global Fasteners & Rings, Inc. was ordered or agreed to perform soil, soil gas, indoor air, and/or groundwater sampling that was ever ordered or agreed to be performed, but never completed.
23. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
24. Please see the confidential documents responsive to this request, which will be submitted in a separate submission
25. See the documents being submitted with these Responses for information responsive to this request. See, e.g., ARC-EPA 011563 to 011566.
26. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
27. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
28. Please see the confidential documents responsive to this request, which will be submitted in a separate submission.
29. As far as Arconic Inc and Arconic Global Fasteners & Rings, Inc. are aware, the Facility has not had any unauthorized, unpermitted or emergency releases into the environment

⁵ Arconic Inc. and Arconic Global Fasteners & Rings, Inc. reserve the right to supplement this response and the attached documents, as well as all other responses and documents provided, should additional information and/or documents come to the attention of Arconic Inc. and/or Arconic Global Fasteners & Rings, Inc.

other than those, if any, relating to conditions existing prior to Arconic Global Fasteners & Rings, Inc. time at the Facility. There are authorized, permitted releases which would be summarized in the Form R (Toxic Release Inventory, or TRI) reports and annual air emissions (AER) reports. Examples of those reports are being submitted with these Responses. See, e.g., ARC-EPA 009766 et seq. and 009799 et seq.

30. There is no such correspondence of which Arconic Inc. and Arconic Global Fasteners & Rings, Inc. other than the documents which are being submitted with these Responses relating to conditions existing prior to Arconic Global Fasteners & Rings, Inc.'s time at the Facility.⁶

31. Response to Request to Arconic Global Fasteners & Rings, Inc.

Huck International, Inc. is a wholly-owned subsidiary of Arconic Global Fasteners & Rings, Inc. To the best of our knowledge, it never owned or operated the Facility. "Arconic Fastening Systems and Rings" is merely a "dba" (doing business as) name given to the unincorporated business unit that serves Arconic Inc.'s fastening systems and rings customers. It is not a legal entity and has no legal significance. In 2014, Arconic Inc. (then known as Alcoa Inc.) acquired Firth Rixson. Subsequent to that acquisition and the separation of Alcoa Inc. into two separately-traded public companies, Arconic Inc. and Alcoa Corporation, Alcoa Global Fasteners, Inc. was renamed Arconic Global Fasteners & Rings, Inc. The only "Arconic" legal entities currently associated with the Facility are Arconic Inc. as the owner of the real property underlying the Facility and Arconic Global Fasteners & Rings, Inc. conducting business at the Facility.

Response to Request to Arconic Inc.

There is no corporate affiliation or relationship between Arconic Inc. or any of Arconic Inc.'s affiliated entities and The Fairchild Corporation or its subsidiary Fairchild Holding Corp. As stated above, Arconic Inc., then known as Alcoa Inc., purchased certain aspects of the fastener business of the Fairchild Corporation on or about December 3, 2002. As part of that acquisition, Arconic Global Fasteners & Rings, Inc. (then known as Alcoa Global Fasteners, Inc.) leased the underlying property from Fairchild Holding Corp. Fairchild Holding Corp. was at that time an indirect, wholly-owned subsidiary of Fairchild Corporation and one of the parties selling certain aspects of the fastener business to Arconic Inc. (then Alcoa Inc.) in 2002. A copy of the acquisition agreement will be provided separately as a confidential submission.

⁶ There may be documents in agency records and files or in the possession of others unaffiliated with Arconic Inc. or Arconic Global Fasteners & Rings, Inc. responsive to this request or other of these Requests. These Responses assume that the U.S. Environmental Protection Agency has greater access to the records of other agencies and equal access to documents possessed by others. That said Arconic Inc. or Arconic Global Fasteners & Rings, Inc. are producing the documents in their possession which are responsive to the Requests.

32. Response to Request to Arconic Global Fasteners & Rings, Inc.

There is no corporate affiliation or relationship between either Arconic Inc. or Arconic Global Fasteners & Rings, Inc., or any of their affiliated entities, and any prior operators of the Facility, including without limitation the Fairchild Holding Corporation and Kaynar Technologies, Inc. As stated above, Arconic Inc., then known as Alcoa Inc., purchased certain fastener assets of the Fairchild Corporation on or about December 3, 2002. The lease to the Facility was part of that acquisition. Fairchild Holding Corp. was at that time an indirect, wholly-owned subsidiary of the Fairchild Corporation and one of the parties in selling certain fastener assets to Arconic Inc. (then Alcoa Inc.) in 2002. As part of that transaction, Fairchild initially leased the Facility to Arconic Global Fasteners & Rings, Inc. (then known as Alcoa Global Fasteners, Inc.). On or about October 31, 2007, Fairchild deeded the real property at the Facility to Alcoa Inc. (now known as Arconic Inc.). The real property at the Facility continues to be owned by Arconic Inc., and the Facility continues to be leased by Arconic Global Fasteners & Rings, Inc.

Response to Request to Arconic Inc.

Please see the confidential documents responsive to this request, which will be submitted in separate submission.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 13, 2018

Certified Mail Number 7011 1570 0002 9580 5614
Return Receipt Requested

Charles Blankenship, CEO
Arconic Inc.
201 Isabella Street
Pittsburgh, PA 15212

Re: CERCLA Section 104(e) Information Request Letter
Orange County North Basin Study Area, Orange County, California

Dear Mr. Blankenship:

The U.S. Environmental Protection Agency is spending public funds to investigate actual or threatened releases of hazardous substances, pollutants, and contaminants at the Orange County North Basin ("OCNB") Study Area, located in Orange County, California. The OCNB Study Area includes portions of Fullerton, Placentia, and Anaheim where groundwater is contaminated with volatile organic chemicals ("VOCs"). EPA is seeking Arconic Inc.'s cooperation in providing information and documents related to this investigation. This letter requests information you may have pertaining to the operations of Arconic Inc. and any of its affiliated entities (e.g., predecessors, parent corporations, subsidiaries) (together, "you" or "the Company"), currently or formerly located at 800 South State College Boulevard, Fullerton, California ("the Facility") that will assist in EPA's investigation of this groundwater contamination. You are requested to answer the questions in Enclosure B. Definitions and instructions on how to respond are provided in Enclosure A.

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, 42 U.S.C. §9600 *et seq.*) Section 104(e) provides EPA with broad information-gathering authority allowing EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility;
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- (C) Information relating to the ability of a person to pay for or perform a cleanup.

The information provided may be used by EPA in administrative, civil, or criminal proceedings.¹ The Company's response should include the name, address, and telephone number of the person to whom EPA should direct future correspondence regarding this information request.

You may consider some of the information requested herein to be confidential, but you may not withhold information on that basis. If you wish EPA to treat the information as confidential, you must

¹ This request for information is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act, because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1); see also, 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a).

advise EPA of that request following the procedures outlined in Enclosure A, including following the requirements for supporting your confidentiality claim.

Compliance with this information request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to CERCLA §104(e)(5), which authorizes EPA to seek penalties of up to \$55,907 per day of noncompliance. Additionally, provision of false, fictitious, or fraudulent statements or representations could subject you to criminal penalties under 18 U.S.C. §1001.

We encourage you to give this request your immediate attention and request that you provide a complete and truthful response **within thirty (30) calendar days of your receipt of this letter**. EPA is committed to moving forward with its investigation, and extensions of time for responses will only be granted on a showing of good cause. If you anticipate that you will need an extension, please request one as soon as possible; requests for extensions made at or near the deadline will not be viewed favorably. The Company's response to this information request should be prepared in the form of a letter together with any enclosures, and signed by a duly authorized representative. If possible, please submit your response as an electronic document, rather than mailing physical documents.

The response to this information request should be directed to:

Kim Muratore, Case Developer (SFD-7-5)

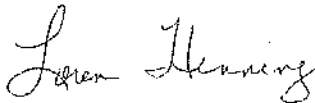
Email address: muratore.kim@epa.gov

Mailing address: U.S. EPA, Region 9, 75 Hawthorne St., San Francisco, CA 94105

To the extent that the Company has been, or is currently, working with a State or local regulatory agency, such as the Regional Water Control Board ("RWQCB") or Department of Toxic Substances Control ("DTSC"), you should continue to do so. EPA's investigation into current and historic potential sources to groundwater contamination is intended as a concurrent activity.

If you have any questions, please contact Ms. Muratore at (415) 972-3121 or send her an email. Questions regarding the OCNB Study Area's cleanup status should be directed to the Remedial Project Manager, Angela Sandoval, at 415-972-3831 or sandoval.angela@epa.gov. Legal questions can be directed to Bethany Dreyfus at (415) 972-3886 or dreyfus.bethany@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,



Loren Henning, Chief
CERCLA Enforcement Section
Superfund Division

Enclosures (2)

ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions in Enclosure B. For each question, if information responsive to this information request is not in the Company's possession, custody, or control, identify any persons from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure B, precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced, indicate on the document, or in some other reasonable manner, the number of the question to which the document corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Company should seek out responsive information from current and former employees and agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify all persons and documents that the Company relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Company after your response has been submitted, EPA hereby requests, pursuant to CERCLA §104(e) that the Company supplement its response.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Company, its attorneys and consultants, or any of their agents, consultants, or employees.
8. Confidential Information. The information requested herein must be provided even if the Company may contend that it includes confidential information or trade secrets. The Company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). For each piece of information over which the Company makes a claim of confidentiality, that claim must be proven. Accordingly, for each document or response the Company claims as confidential, it must separately address the following points:
 - (a) Identify the specific portions of the information alleged to be entitled to confidential treatment;
 - (b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, permanently);

- (c) Identify measures taken by the Company to guard against the undesired disclosure of the information to others;
 - (d) Explain the extent to which the information has been disclosed to others and the precautions taken in connection therewith;
 - (e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - (f) State whether the Company asserts that disclosure of the information would likely result in substantial harmful effects to the Company's competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
 - (g) To make a confidentiality claim, please stamp, or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. The Company should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit the Company's response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which the Company desires confidential treatment are in another envelope.
 - (h) All confidentiality claims are subject to EPA verification. It is important that the Company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that the information is not and has not been obtainable by legitimate means without the Company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to the Company.
9. Disclosure to EPA's Representatives. Information that the Company submits in response to this information request may be disclosed by EPA to authorized representatives of the United States pursuant to 40 C.F.R. §2.310(h), even if the Company asserts that all or part of it is confidential business information (CBI). EPA may also share this information with other parties, such as co-regulatory agencies, if the Company has been notified in advance. Parties to which EPA intends to disclose information contained in the Company's response are as follows:

Department of Toxic Substances Control
California Environmental Protection Agency

Regional Water Quality Control Board
California Environmental Protection Agency

Toerock Associates, Inc.
EPA Contract Number EP-S9-16-01

Arctic Slope Mission Services, LLC
EPA Contract Number EP-W1-7011

Any subsequent additions or changes to this list of who may be granted access to the Company's response to this information request will be published in the Federal Register. This information may be made available to these entities for any of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; to provide expert technical review of the contents of the response; or as a co-regulatory agency. Pursuant to 40 C.F.R. §2.310(h), the Company may submit comments on EPA's potential disclosure of any confidential information to these entities within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If the Company has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Enclosure B, Information Request:

1. Any reference to Arconic Inc. or "the Company" should be interpreted to include, but not be limited to, all officers, directors, shareholders, general partners, limited partners, managers, employees, contractors, assigns, agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates and branches.
2. The term "person" includes any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term "waste" or "wastes" includes trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid or sludge.
4. The term "hazardous waste" has the same definition as that contained in Section 1004(5) of RCRA.
5. The term "hazardous substance" has the same definition as that contained in CERCLA §101(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term "release" has the same definition as that contained in CERCLA §101(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term "pollutant or contaminant" has the same definition as that contained in CERCLA §101(33) and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term "materials" means all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

10. The term "Facility" includes the entire property as defined or any discrete portion thereof, plus any improvements thereto. If the Company's answer refers only to a discrete portion of the Facility, it should specify which portion is being referred to.

ENCLOSURE B: INFORMATION REQUEST

1. State the full legal name, address, telephone number, email address, and position(s) held by any individual answering any of these questions on behalf of Arconic Inc. ("the Company").
2. Identify the dates the Company, under any of its current or former business structures, has owned and/or operated the facility located at 800 South State College Boulevard, Fullerton, California (the "Facility").
3. Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.
4. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included operations that utilized or generated these hazardous substances, or who were responsible for storing/filling/disposing of hazardous substances and/or wastes containing the above-identified chemicals. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.
5. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.
6. Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as its operational status (e.g., whether and where business operations are currently occurring).
7. Provide the date and in which State the Company was incorporated, formed, or organized.
8. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name.
9. If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.
10. If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

11. If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, change the types of solvents being used).
12. If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by the Company after it began operating at the Facility that changed (either increases or decreases) the use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.
13. For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.
14. For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.
15. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.
16. Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers (there were at least three), clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:
 - a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);
 - c. Stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
 - d. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and
 - e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).
17. Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.
18. Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

19. Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.
20. For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information:
 - a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;
 - b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;
 - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - d. The quantity purchased (in gallons) and the time period during which it was used; and
 - e. Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.
21. Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.
 - a. State whether the information provided represent a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.
 - b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.
22. Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but that was never completed. Explain, to the best of your ability, why the sampling was not conducted.
23. Provide copies of any due diligence reports or property transfer assessments related to the Facility.
24. Identify, and provide the following information for, all groundwater wells located at the Facility:
 - a. A map with the specific locations of the groundwater wells;
 - b. Dates of well construction;
 - c. Depth to groundwater, depth of well, and depth to and of screened intervals;
 - d. Uses of each well;
 - e. Date each well was abandoned, if applicable;
 - f. Date each well was sampled;
 - g. All constituents analyzed for during groundwater sampling events; and
 - h. All groundwater sampling results, reports of findings, and analytical data.

25. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).
26. For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
27. If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.
28. Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.
29. Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:
 - a. The date each release occurred;
 - b. The cause of each release;
 - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d. Where each release occurred and what areas were impacted by the release; and
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
30. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.
31. Describe the corporate relationship or affiliation between the Company and The Fairchild Corporation and its subsidiary Fairchild Holding Corp. Provide copies of all documentation evidencing or describing this corporate relationship or affiliation, including a complete, executed copy (including all exhibits) of the 2002 acquisition agreement between the Company and the Fairchild parties. Did Alco, Inc. acquire both the assets and liabilities of Fairchild Fasteners?
32. If the Company is aware of any environmental liabilities related to operations of the Facility by The Fairchild Corporation and/or Fairchild Holding Corp. or any of their predecessors being transferred to and assumed by the Company as part of the 2002 transaction, provide an explanation of the transactions by which this was effected and identify the party that assumed the environmental liabilities. Please also provide copies of all documentation evidencing the transfer and assumption of environmental liabilities associated with the Facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

December 10, 2018

Certified Mail Number 7011 1570 0002 9580 5553
Return Receipt Requested

Vitaliy Rusakov, CEO
Arconic Global Fasteners & Rings, Inc.
201 Isabella St.
Pittsburgh, PA 15212

Re: CERCLA Section 104(e) Information Request Letter
Orange County North Basin Study Area, Orange County, California

Dear Mr. Rusakov:

The U.S. Environmental Protection Agency is spending public funds to investigate actual or threatened releases of hazardous substances, pollutants, and contaminants at the Orange County North Basin ("OCNB") Study Area, located in Orange County, California. The OCNB Study Area includes portions of Fullerton, Placentia, and Anaheim where groundwater is contaminated with volatile organic chemicals ("VOCs"). EPA is seeking the cooperation of Arconic Global Fasteners & Rings, Inc. ("Arconic") in providing information and documents related to this investigation. This letter requests information you may have pertaining to the operations of Arconic and any of its affiliated entities (e.g., predecessors, parent corporations, subsidiaries) (together, "you" or "the Company"), currently or formerly located at 800 South State College Boulevard, Fullerton, California ("the Facility") that will assist in EPA's investigation of this groundwater contamination. You are requested to answer the questions in Enclosure B. Definitions and instructions on how to respond are provided in Enclosure A.

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, 42 U.S.C. §9600 *et seq.*) Section 104(e) provides EPA with broad information-gathering authority allowing EPA to require persons to furnish information or documents relating to:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility;
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- (C) Information relating to the ability of a person to pay for or perform a cleanup.

The information provided may be used by EPA in administrative, civil, or criminal proceedings.¹ The Company's response should include the name, address, and telephone number of the person to whom EPA should direct future correspondence regarding this information request.

¹ This request for information is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act, because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1); see also, 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a).

You may consider some of the information requested herein to be confidential, but you may not withhold information on that basis. If you wish EPA to treat the information as confidential, you must advise EPA of that request following the procedures outlined in Enclosure A, including following the requirements for supporting your confidentiality claim.

Compliance with this information request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to CERCLA §104(e)(5), which authorizes EPA to seek penalties of up to \$55,907 per day of noncompliance. Additionally, the provision of false, fictitious, or fraudulent statements or representations could subject you to criminal penalties under 18 U.S.C. §1001.

We encourage you to give this request your immediate attention and request that you provide a complete and truthful response **within thirty (30) calendar days of your receipt of this letter**. EPA is committed to moving forward with its investigation, and extensions of time for responses will only be granted on a showing of good cause. If you anticipate that you will need an extension, please request one as soon as possible; requests for extensions made at or near the deadline will not be viewed favorably. The Company's response to this information request should be prepared in the form of a letter together with any enclosures, and signed by a duly authorized representative. If possible, please submit your response as an electronic document, rather than mailing physical documents.

The response to this information request should be directed to:

Kim Muratore, Case Developer (SFD-7-5)

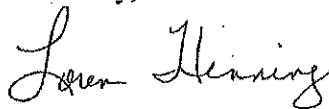
Email address: muratore.kim@epa.gov

Mailing address: U.S. EPA, Region 9, 75 Hawthorne St., San Francisco, CA 94105

To the extent that the Company has been, or is currently, working with a State or local regulatory agency, such as the Regional Water Control Board ("RWQCB") or Department of Toxic Substances Control ("DTSC"), you should continue to do so. EPA's investigation into current and historic potential sources to groundwater contamination is intended as a concurrent activity.

If you have any questions, please contact Ms. Muratore at (415) 972-3121 or send her an email. Questions regarding the OCNB Study Area's cleanup status should be directed to the Remedial Project Manager, Kathleen Aisling, at (213) 244-1823 or aisling.kathleen@epa.gov. Legal questions can be directed to Bethany Dreyfus at (415) 972-3886 or dreyfus.bethany@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,



Loren Henning, Manager
CERCLA Enforcement Section
Superfund Division

Enclosures (2)

ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Every Question Completely. A separate response must be made to each of the questions in Enclosure B. For each question, if information responsive to this information request is not in the Company's possession, custody, or control, identify any persons from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Enclosure B, precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced, indicate on the document, or in some other reasonable manner, the number of the question to which the document corresponds.
4. Provide the Best Information Available. Provide responses to the best of the Company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. The Company should seek out responsive information from current and former employees and agents. Submission of cursory responses when other responsive information is available will be considered non-compliance with this information request.
5. Identify Sources of Answer. For each question, identify all persons and documents that the Company relied on in producing its answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this information request become known or available to the Company after your response has been submitted, EPA hereby requests, pursuant to CERCLA §104(e) that the Company supplement its response.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of the Company, its attorneys and consultants, or any of their agents, consultants, or employees.
8. Confidential Information. The information requested herein must be provided even if the Company may contend that it includes confidential information or trade secrets. The Company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). For each piece of information over which the Company makes a claim of confidentiality, that claim must be proven. Accordingly, for each document or response the Company claims as confidential, it must separately address the following points:
 - (a) Identify the specific portions of the information alleged to be entitled to confidential treatment;

- (b) Identify the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, permanently);
 - (c) Identify measures taken by the Company to guard against the undesired disclosure of the information to others;
 - (d) Explain the extent to which the information has been disclosed to others and the precautions taken in connection therewith;
 - (e) Provide pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - (f) State whether the Company asserts that disclosure of the information would likely result in substantial harmful effects to the Company's competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
 - (g) To make a confidentiality claim, please stamp, or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. The Company should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit the Company's response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which the Company desires confidential treatment are in another envelope.
 - (h) All confidentiality claims are subject to EPA verification. It is important that the Company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that the information is not and has not been obtainable by legitimate means without the Company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to the Company.
9. Disclosure to EPA's Representatives. Information that the Company submits in response to this information request may be disclosed by EPA to authorized representatives of the United States pursuant to 40 C.F.R. §2.310(h), even if the Company asserts that all or part of it is confidential business information (CBI). EPA may also share this information with other parties, such as co-regulatory agencies, if the Company has been notified in advance. Parties to which EPA intends to disclose information contained in the Company's response are as follows:

Department of Toxic Substances Control
California Environmental Protection Agency

Regional Water Quality Control Board
California Environmental Protection Agency

Toeroek Associates, Inc.

EPA Contract Number EP-S9-16-01

Arctic Slope Mission Services, LLC
EPA Contract Number EP-W1-7011

Any subsequent additions or changes to this list of who may be granted access to the Company's response to this information request will be published in the Federal Register. This information may be made available to these entities for any of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; to provide expert technical review of the contents of the response; or as a co-regulatory agency. Pursuant to 40 C.F.R. §2.310(h), the Company may submit comments on EPA's potential disclosure of any confidential information to these entities within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If the Company has objections to some or all of the questions contained in the information request, it is still required to respond to each of the questions.

Definitions Applicable to Enclosure B, Information Request:

1. Any reference to Arconic Global Fasteners & Rings, Inc. or "the Company" should be interpreted to include, but not be limited to, all officers, directors, shareholders, general partners, limited partners, managers, employees, contractors, assigns, agents, trustees, predecessors, successors, subsidiaries, operating divisions, affiliates and branches.
2. The term "person" includes any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term "waste" or "wastes" includes trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid or sludge.
4. The term "hazardous waste" has the same definition as that contained in Section 1004(5) of RCRA.
5. The term "hazardous substance" has the same definition as that contained in CERCLA §101(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term "release" has the same definition as that contained in CERCLA §101(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

7. The term "pollutant or contaminant" has the same definition as that contained in CERCLA §101(33) and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term "materials" means all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
10. The term "Facility" includes the entire property as defined or any discrete portion thereof, plus any improvements thereto. If the Company's answer refers only to a discrete portion of the Facility, it should specify which portion is being referred to.

ENCLOSURE B: INFORMATION REQUEST

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2. Identify the dates the Company, under any of its current or former business structures, has owned and/or operated the facility located at 800 South State College Boulevard, Fullerton, California (the "Facility").
3. Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.
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5. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.
6. Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as its operational status (e.g., whether and where business operations are currently occurring).
7. Provide the date and in which State the Company was incorporated, formed, or organized.
8. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name.
9. If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.
10. If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

11. If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, change the types of solvents being used).
12. If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by the Company after it began operating at the Facility that changed (either increases or decreases) the use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.
13. For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.
14. For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.
15. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.
16. Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers (there were at least three), clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:
 - a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);
 - c. Stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
 - d. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and
 - e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).
17. Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.

18. Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.
19. Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.
20. For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information:
 - a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;
 - b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;
 - c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - d. The quantity purchased (in gallons) and the time period during which it was used; and
 - e. Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.
21. Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.
 - a. State whether the information provided represent a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.
 - b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.
22. Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but that was never completed. Explain, to the best of your ability, why the sampling was not conducted.
23. Provide copies of any due diligence reports or property transfer assessments related to the Facility.
24. Identify, and provide the following information for, all groundwater wells located at the Facility:
 - a. A map with the specific locations of the groundwater wells;
 - b. Dates of well construction;
 - c. Depth to groundwater, depth of well, and depth to and of screened intervals;
 - d. Uses of each well;
 - e. Date each well was abandoned, if applicable;
 - f. Date each well was sampled;

- g. All constituents analyzed for during groundwater sampling events; and
 - h. All groundwater sampling results, reports of findings, and analytical data.
25. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).
 26. For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
 27. If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.
 28. Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.
 29. Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:
 - a. The date each release occurred;
 - b. The cause of each release;
 - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d. Where each release occurred and what areas were impacted by the release; and
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
 30. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.
 31. To the extent not already provided in responses to the above-listed questions, describe any corporate affiliation or relationship between the Company and Huck International, Inc., which also appears to be doing business under the name of "Arconic Fastening Systems and Rings". Please also state whether Huck International, Inc. has owned or operated the Facility and the time periods during which it has owned or operated the Facility.
 32. State whether there is any corporate affiliation or relationship between the Company or its affiliated entities and prior operators of the Facility, including, but not limited to, Kaynar Technologies Inc. and Fairchild Holding Corp. If such a relationship exists, please describe the nature of the corporate affiliation or relationship.